

REVISED: Evaluation of Wilderness Characteristics for Lands that may be Suitable for Inclusion in the National Wilderness Preservation System

This document details how the GMUG interpreted the Forest Service Handbook 1909.12 Chapter 70 evaluation criteria, and incorporates revisions based on public input.

Introduction

When revising the land management plan, the GMUG National Forests (GMUG) are required to identify and evaluate lands that may or may not be suitable for inclusion in the National Wilderness Preservation System (NWPS) and determine whether to recommend any such lands for wilderness.¹ A description of this process can be found in the 2012 Forest Service Planning Rule and Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12. This process includes the following four steps:

1. Inventory. Identify and inventory all lands that may or may not be suitable for inclusion in the National Wilderness Preservation System using a required set of criteria.
2. Evaluation. Evaluate the wilderness characteristics of each inventoried area (polygon) using a required set of criteria.
3. Analysis. The forest supervisor will determine which polygons to further analyze in the National Environmental Policy Act (NEPA) process.
4. Recommendation. The forest supervisor will decide which polygons, if any, to recommend for inclusion in the NWPS. Lands evaluated and analyzed through this process and the resulting NEPA analysis are only preliminary administrative recommendations. Congress has reserved the authority to make final decisions on wilderness designation.

Step 2: Evaluation of Wilderness Characteristics

The primary function of the Evaluation step is to evaluate the *wilderness characteristics* of lands included in the final Inventory, using the criteria set forth in the Wilderness Act of 1964 as described in the [Forest Service Handbook 1909.12, Chapter 70](#), section 72. The Evaluation step assesses lands included in the final Inventory for the following *wilderness characteristics*:

- 1) **Apparent naturalness;**
- 2) Outstanding opportunities for **solitude or primitive/unconfined type of recreation;**
- 3) **Sufficient size** to make its preservation and use in an unimpaired condition practicable;
- 4) **Ecological, geological, or other features** of scientific, educational, scenic, or historical value; and,
- 5) Degree to which the area may be **managed to preserve its wilderness characteristics.**

The Evaluation map and dataset include all polygons that met the Inventory criteria listed in the Final Inventory Criteria document. The Evaluation step is implemented with a combination of geospatial (map) data, District specialist knowledge, interdisciplinary team discussion, and public input. The *Wilderness Characteristics Evaluation Guide* (Table 1) was developed to assist in making a determination of whether each Evaluation polygon possesses **High, Moderate, Low, or No** wilderness characteristics.

¹ FSH 1909.12 Chapter 70, section 71.21 and section 71.22a.

This guidance material helps ensure consistent, methodical assessment of the Evaluation polygons across the GMUG's three Forests and five Ranger Districts. This guidance material also strives to communicate the Evaluation process transparently, as well as facilitate informed public review and input on the Evaluation.

As depicted in Table 1, most wilderness characteristics have several sub-criteria to consider. For example, Criterion 1 (Apparent Naturalness) has three specific sub-criteria. For instance, *Question 1b: What is the extent to which the area appears to reflect ecological conditions that would normally be associated with the area without human intervention?* Several factors could contribute to 1b, as noted in the "Evaluation Considerations" column. This column lists several aspects to contemplate for each criteria question, but these suggested considerations are not exhaustive or exclusive. Although assessment of each of these criterion factors involves a level of subjectivity, the *Wilderness Characteristics Evaluation Guide* provides side-bars to channel evaluation discussions as objectively and consistently as possible. To that end, the "Evaluation Considerations" column presents specific fact-finding prompts regarding what is, or is not, present within each polygon.

The five Ranger Districts and the Planning interdisciplinary team collectively developed the draft Evaluation and draft rating that indicates whether each Evaluation polygon on the GMUG has **High, Moderate, Low, or No** wilderness characteristics. All ratings are displayed on the Wilderness Evaluation Map (draft and final). A narrative describing current conditions and providing rationale for the *wilderness characteristics* rating corresponds with each mapped Evaluation polygon. Narratives for each of the Evaluation polygons are compiled into an Evaluation Report. Public input on the draft Evaluation Report will inform the final Evaluation Report. General characterizations for **High, Moderate, Low, and No** wilderness characteristic ratings are outlined below.

Note: All polygons included in the final Inventory were fully assessed for each wilderness characteristics criteria during the Evaluation stage. Polygons, or portions of polygons, that do not possess sufficient wilderness characteristics will not be carried forward into the next Analysis stage of the Wilderness Process. As required by Forest Service Handbook 1909.12, Chapter 70, section 73 (Analysis), the Responsible Official will document rationale for excluding each evaluated polygon, or portions thereof, that are not included in an alternative in the Forest Plan NEPA analysis.

General Characterizations of Wilderness Characteristics Ratings

High wilderness characteristics – An Evaluation polygon that possesses **High wilderness characteristics** has a naturally-appearing composition of plant and animal species, and though non-natives may be present, they don't detract from the natural appearance. There is little to no evidence of landscape modifications throughout the majority of the polygon. The polygon may have improvements (infrastructure); however, the improvements do not detract from the polygon's overall natural appearance because they are isolated throughout the polygon, are small in size, are concealed within vegetation, and/or are historic, rustic structures that don't detract from the natural landscape (i.e., evidence of historic mining). The polygon presents abundant opportunities for Forest visitors to experience solitude or engage in primitive-type recreation activities, and the majority of these opportunities are high quality. Abundant opportunities for solitude exist due to factors such as sufficient size and topography that effectively buffer most sights and sounds of civilization from outside of the polygon, such as highways and cities, as well as other visitors within the area. Or, many high-quality opportunities for primitive or unconfined recreation exists because visitors can feel removed from civilization, self-reliant, and connected to the land throughout most of the area. The polygon may also possess unique and outstanding qualities that are iconic or locally, regionally, or nationally important. While such qualities are not required, the presence of any unique or outstanding qualities within the polygon may enhance the grounds for preserving the polygon in an unimpaired condition. The polygon's mostly coherent shape (i.e., smooth boundary without

many protrusions), ability to be configured along natural terrain boundaries, and proximity to other designated areas would facilitate the preservation of its wilderness characteristics should the polygon be recommended for inclusion in the NWPS. Legally-established rights and uses within the polygon, and/or relevant laws, would not affect the ability to preserve its existing wilderness characteristics. Compatible management of adjacent lands could also facilitate preservation of its identified wilderness characteristics.

Moderate wilderness characteristics – An Evaluation polygon that possesses ***Moderate wilderness characteristics*** has a somewhat naturally-appearing composition of plant and animal species, some non-native species present that may detract from the natural appearance in portions of the area, and minor evidence of landscape modifications throughout much of the polygon. The polygon includes some improvements, but more than half of the improvements present on the landscape do not detract from the polygon's overall natural appearance because they are scattered throughout the polygon, are smaller in size, and/or are mostly concealed within vegetation. The polygon presents some opportunities for Forest visitors to experience solitude or engage in primitive-type recreation activities, and at least some of these opportunities are high quality. Traversing some pockets of the polygon allows Forest visitors to feel removed from civilization, self-reliant, and connected to the land. Sights and sounds of other humans and human activities are noticeable in some parts of the polygon, but there are large areas where these sights and sounds can be avoided. The polygon may also possess unique and outstanding qualities that are iconic or locally, regionally, or nationally important. While such qualities are not required, the presence of any unique or outstanding qualities within the polygon may enhance the grounds for preserving the polygon in an unimpaired condition. The polygon's overall shape and configuration could potentially facilitate the preservation of its wilderness characteristics should the polygon be recommended for inclusion in the NWPS. Legally-established rights and uses within the polygon, and/or relevant laws, may create a management challenge but would not greatly affect the ability to preserve its existing wilderness characteristics. Adjacent lands with a variety of compatible and conflicting management could present some management challenges in successfully preserving the polygons' wilderness characteristics.

Low wilderness characteristics – An Evaluation polygon that possesses ***Low wilderness characteristics*** does not reflect a naturally-appearing composition of plant and animal species, has widespread non-native species, and/or significant evidence of landscape modifications throughout the majority of the polygon. Large portions of the polygon are dominated by improvements, and most improvements detract from the polygon's overall natural appearance due to a high concentration of improvements and/or the presence of highly-visible, large improvements. There are little to no opportunities for Forest visitors to experience solitude or engage in primitive-type recreation activities, and none of the limited opportunities are high-quality. Sights and sounds of other humans and human activities are pervasive throughout the majority of the polygon and cannot easily be avoided. The polygon may possess unique and outstanding qualities that are iconic or locally, regionally, or nationally important, but this criteria alone does not affect the rating. The polygon's irregular shape and configuration, as well as lack of natural terrain boundaries, would make it more difficult to preserve any existing wilderness characteristics should the polygon be recommended for inclusion in the NWPS. Legally-established rights and uses within the polygon, and/or relevant laws, would severely affect the ability to preserve its existing wilderness characteristics. Adjacent lands with incompatible and conflicting management would make it difficult to preserve existing wilderness characteristics within the polygon.

No wilderness characteristics – An Evaluation polygon that possesses ***No wilderness characteristics*** does not, as a whole, appear natural due to pervasive landscape modifications, dominant non-native species, and prominently-evident permanent improvements and/or does not provide any quality opportunities for Forest visitors to experience solitude or engage in primitive-type recreation activities. In short, any existing wilderness characteristics in the area would be very limited in both quantity and quality. Legally-established rights and uses within the polygon, and/or relevant laws, would make it extremely difficult to manage the polygon to preserve its limited wilderness characteristics.

Table 1: Wilderness Characteristics Evaluation Guide

Wilderness Characteristic	Evaluation Criteria	Evaluation Considerations
<p><u>Criterion 1:</u></p> <p>Apparent Naturalness</p> <p>The degree to which the area general appears to be affected primarily by the forces of nature, with the imprints of man's work substantially unnoticeable.</p>	<p>Question 1a.</p> <p>What is the composition of plant and animal communities?</p> <p><i>The purpose of this factor is to determine if plant and animal communities appear substantially unnatural.</i></p>	<ul style="list-style-type: none"> Does the composition of plant and animal communities appear substantially unnatural? What are the dominant vegetation types? What animal species can be found in the polygon? What is the concentration and distribution of non-native species throughout the polygon? (isolated, scattered, common, or dominant)
	<p>Question 1b.</p> <p>What is the extent to which the area appears to reflect ecological conditions that would normally be associated with the area without human intervention?</p>	<ul style="list-style-type: none"> Does the landscape appear modified? What is the visibility of past vegetation treatments (e.g. thinning) or timber harvest in the polygon?

Wilderness Characteristic	Evaluation Criteria	Evaluation Considerations
	<p>Question 1c. What is the extent to which improvements included in the area represent a departure from apparent naturalness?</p> <p><i>Consider how the polygon's vegetation and terrain affect a visitor's awareness of improvements (i.e., a small structure in an open landscape may impact apparent naturalness more than a larger structure in a densely forested landscape).</i></p> <p>--</p> <p><i>Forest Service Handbook 1909.12 Chapter 70 Section 71.22 – <u>Improvements Criteria:</u></i></p> <p><i>Pursuant to the Wilderness Act, include in the inventory areas "where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean... an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; ..."(16 U.S.C. 1131c).</i></p>	<ul style="list-style-type: none"> ▪ Is there evidence of human activity within the polygon? ▪ <u>Identify occurrences of:</u> System motorized and non-motorized trails, ML1 roads, old road beds, grazing infrastructure (fencing, corrals, etc.), scientific infrastructure (permanent or temporary), mining infrastructure, wildlife improvements, water developments, ditches, backcountry huts, etc. ▪ What is the prevalence, concentration, and spatial distribution of improvements in the polygon (isolated, scattered, common, or dominant)? ▪ How established are the improvements on the landscape (permanent structures -v- faded old road beds)? ▪ Do improvements in the polygon detract from apparent naturalness?

Wilderness Characteristic	Evaluation Criteria	Evaluation Considerations
<p><u>Criterion 2:</u></p> <p>Solitude <u>or</u> Primitive and Unconfined Recreation²</p> <p>The degree to which the area has outstanding opportunities for solitude <u>or</u> for a primitive and unconfined type of recreation.</p>	<p>Question 2a.</p> <p>To what degree does the area have outstanding opportunities for solitude?</p> <p>Consider impacts that are pervasive and influence a visitor's opportunity for solitude <i>within</i> the evaluated area.</p> <p><i>Factors to consider may include topography, presence of screening, distance from impacts, degree of permanent intrusions, and pervasive sights and sounds from <u>outside</u> the area.</i></p>	<ul style="list-style-type: none"> What type of human activities occur in the polygon (recreation, grazing, mining, cultural or traditional uses, special uses)? What is the frequency and density of human presence in the polygon? Are disturbances to solitude in the polygon typically intermittent or permanent? Can human presence or activities be avoided? (dense vegetation or terrain for screening) How pervasive are sights and sounds of human activity originating from <i>outside</i> of the polygon? Consider the inventoried Recreation Opportunity Spectrum (ROS) classes within the polygon.
	<p>Question 2b.</p> <p>To what degree does the area have outstanding opportunities for primitive and unconfined type of recreation?</p> <p>Consider the extent to which the area provides visitors with opportunities to engage in primitive-type or unconfined recreation activities that lead a visitor's ability to feel a part of nature.</p> <p><i>High-quality primitive and unconfined recreation activities are typically those that are challenging and/or require elevated self-reliance. There would generally be a lack of <u>developed</u> facilities.</i></p>	<ul style="list-style-type: none"> What opportunities for primitive and unconfined recreation are available in the polygon, and how often are they available (seasonal, or year-round)? Are any of the available opportunities of high quality? To what extent could the polygon provide for Primitive or Semi-Primitive Non-Motorized ROS class opportunities? Primitive-type recreation activities include: Observing wildlife, hiking, backpacking, horseback riding, fishing, hunting, floating, kayaking, cross-country skiing, camping, and enjoying nature.

² Per Forest Service Handbook 1909.12 Directives, Chapter 70, section 72.1(2), the word "or" means that an area only has to possess one or the other – outstanding opportunities for solitude *or* primitive/unconfined recreation. The area does not have to possess outstanding opportunities for both elements, nor does it need to have outstanding opportunities on every acre.

Wilderness Characteristic	Evaluation Criteria	Evaluation Considerations
<u>Criterion 3:</u> Size (less than 5,000 acres)³	Question 3a. For areas smaller than 5,000 acres and not contiguous to existing Wilderness: Is the area large enough to make its preservation and use in an unimpaired condition practicable? (<i>ties to Criterion 5</i>)	<ul style="list-style-type: none"> What about the polygon makes it practicable or impracticable to preserve in an unimpaired condition?
<u>Criterion 4:</u> Unique and outstanding qualities⁴ The degree to which the area may contain ecological, geological, or other features of scientific, educational, scenic, or historical value. These values are <u>not required to be present</u> in an area for the area to be recommended for	Question 4a. Does the area contain rare plant or animal communities, or rare ecosystems? ⁵ <i>(Rare can be determined locally, regionally, nationally, or within the system of protected designations.)</i>	<ul style="list-style-type: none"> Does the polygon contain any plant or animal species currently assigned a ranking of G1/S1 or G2/S2⁶ by the Colorado Natural Heritage Program (CNHP)?⁷ Does the polygon contain or overlap with any Potential Conservation Areas (PCA) currently assigned a biological significance ranking of B1 or B2 by the CNHP?⁸ Does the area provide a unique or outstanding ecological function (for instance, serves as an important migratory corridor, connectivity corridor, or nesting area)?

³ Only applicable Evaluation polygons will be evaluated under Criteria 3 during the Evaluation stage.

⁴ The unique and outstanding features listed in Criterion 4 questions 4a through 4e are provided as examples and are not intended to be exhaustive.

⁵ Data sources include Colorado Natural Heritage Program, Natural Resource Information System, and Colorado Parks and Wildlife.

⁶ For this process, species with a “range-rank” of G2G3 or S2S3 were treated as G2 or S2.

⁷ The CNHP standardized ranking system reflects species and ecosystems ranked on the global (G) and state (S) levels, with 1 signifying “Critically Imperiled” and 2 signifying “Imperiled” (i.e., G1 = Globally Ranked Critically Imperiled, and S2 = State Ranked Imperiled). CNHP also assigns sub-rank qualifiers, including sub-rankings for Infra-specific Taxon (T) (i.e., G2T1 = Globally Critically Imperiled Species, with Subspecies or Variety in Question Critically Imperiled). T1 and T2 sub-rankings were used for wildlife species. No GMUG plant species include (T) sub-rankings from CNHP. This classification scheme encompasses species listed as Threatened & Endangered under the Endangered Species Act, as well as species included on the Regional Forester’s Sensitive Species list. Species currently ranked by CNHP as G1/S1 and G2/S2 reflect the rarity of these species. *For more information:* <https://cnhp.colostate.edu/ourdata/help/heritage/>.

⁸ PCAs highlight areas in the state contributing to Colorado’s biological diversity, and their boundaries encompass rare species and natural plant communities. PCAs are assigned biological significance ranks using a 1-5 ranking system with 1 being globally outstanding and 5 being locally significant. PCAs currently ranked by CNHP as B1 or B2 reflect the rarity of these areas. *For more information:* <https://cnhp.colostate.edu/ourdata/pca-reports/>.

Wilderness Characteristic	Evaluation Criteria	Evaluation Considerations
<p>inclusion in the NWPS, but their presence should be identified and evaluated where they exist.</p> <p><u>Note:</u></p> <p><i>When assessing unique and outstanding qualities, consider if the feature is iconic, unique at a regional or national scale, and the extent that the feature defines how people think about and value the area.</i></p>	<p>Question 4b. Are there any outstanding landscape features such as waterfalls, mountains, viewpoints, waterbodies, or geologic features?</p>	<ul style="list-style-type: none"> ▪ If present in the polygon, why is the landscape feature outstanding or unique? ▪ Does the polygon include any trail segments that are part of a National Scenic or Recreation Trail?
	<p>Question 4c. Are there historic and cultural resource sites in the area of regional or national significance?</p>	<ul style="list-style-type: none"> ▪ Does the polygon include any Priority Heritage Assets?⁹ ▪ Does the polygon include any trail segments that are part of a National Historic Trail?
	<p>Question 4d. Are there any Research Natural Areas (RNA)?</p>	<ul style="list-style-type: none"> ▪ If present, what is the name, attributes, and location of the RNA, and when was it established?
	<p>Question 4e. Are there any high-quality water resources or important watershed features?</p>	<ul style="list-style-type: none"> ▪ If present, why is the water resource or watershed feature outstanding or unique? ▪ If present, why is the water resource or watershed feature high-quality and/or important? ▪ Does the polygon include any eligible Wild and Scenic River segments?¹⁰

⁹ To focus finite resources on the most important cultural resources (heritage assets), the Forest Service's Heritage Program developed the concept of Priority Heritage Assets. The Forest Service further defines Priority Heritage Assets as those heritage assets of distinct public value that are, or should be, actively maintained and meet one or more established criteria outlined in Forest Service Manual 2300, Chapter 2360 (Heritage Program Management).

¹⁰ An eligibility report has never been finalized for the GMUG National Forests. However, a Wild and Scenic Rivers process (Forest Service Handbook 1909.12 Chapter 80) is on-going for the current Forest Plan Revision. Results of that process will be appended to the Revised Evaluation Report at such time as those results become available.

Wilderness Characteristic	Evaluation Criteria	Evaluation Considerations
<p>Criterion 5:</p> <p>Manageability</p> <p><i>Note:</i></p> <p><i>Manageability concerns identified in Evaluation can sometimes be addressed by adjusting polygon boundaries in Analysis.</i></p>	<p>Question 5.</p> <p>To what degree can the area be managed to preserve its wilderness characteristics?</p> <p><i>Consider such factors as:</i></p> <p>5a. Shape and configuration of the area;</p> <p>5b. Legally established rights or uses within the area;</p> <p>5c. Specific Federal or State laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics;</p> <p>5d.¹¹ The presence and amount of non-Federal land in the area; and</p> <p>5e. Management of adjacent lands.</p>	<ul style="list-style-type: none"> ▪ How could the shape/size of the polygon aid or impede the ability to manage the polygon to preserve its wilderness characteristics? Could any manageability complexities be reduced by adjusting the polygon's boundaries? For example, can the polygon's terrain features (e.g., ridgelines or canyon rims) be used for natural boundaries to more easily control use and access within the polygon? ▪ What are the current types and extent of legal requirements or restrictions within the polygon (i.e., designated critical habitat, National Scenic or Historic Trail, or Colorado Roadless Area), and to what degree do they contribute to or affect the agency's ability to manage the polygon to preserve its wilderness characteristics? ▪ What is the presence and extent of existing rights of use in the polygon? (mineral rights, leases, water rights, allotments, easements). ▪ What is the distribution, extent, and type of non-Federal lands and non-federal access that is surrounded by and/or adjacent to the polygon? ▪ What is the general management of adjacent lands, and what entities administer those lands (i.e., BLM Wilderness, BLM Wilderness Study area, other National Forests, National Parks Service, state lands, etc.)?

¹¹ Non-federal lands may be interspersed within/adjacent to National Forest lands for a given Evaluation polygon, but only Forest lands are being evaluated for their wilderness characteristics. Non-federal lands are excluded from the Evaluation polygons.

Appendix I. Summary of Public Input & Response:

In response to public comments, a total of about 95,000 acres were reincorporated to the revised Inventory and therefore included in the draft Evaluation map. The following is a summary of public comments on the draft Evaluation criteria, and how we have addressed the comments in the revised Evaluation criteria.

- A. **Polygon details:** Comments include specific details and/or concerns about polygons such as geographic aspects, ecological conditions, uses, management activities and strategies, economic implications, special qualities, and place-based values. Comments also express support for specific polygons and include suggested boundary modifications, should those areas be recommended for Wilderness.

This information will be included and/or considered during Evaluation and Analysis (for those polygons carried forward for analysis because they are included in one or more forest plan alternatives). Inventoried polygons are those that met the inclusive parameters outlined in the Inventory Criteria document. During Evaluation, all inventoried polygons are evaluated for wilderness characteristics. For the purposes of having larger and fewer polygons to evaluate, inventoried polygons have been adjoined, where appropriate, to create evaluation polygons. The Analysis step begins with the Forest Supervisor determining which evaluated areas, if any, to further analyze in the Environmental Analysis process as part of the Forest Plan proposed action alternatives. The Analysis step will look more closely at considerations such as current uses of the area and potential trade-offs should an area (or portion of an area) be recommended to be designated as wilderness. Additionally, finer boundary adjustments are expected to occur for any polygons analyzed, and potentially recommended, for inclusion in the NWPS.

- B. **Suitable timber base:** Comments request that language be included in the Evaluation criteria regarding suitable timber acres, and that lands considered as suitable for timber harvest or previously identified as needing forest treatment be excluded from evaluation.

The identification of areas suitable timber production is under development for the GMUG's Forest Plan revision process and will be presented in Draft Plan alternatives. As directed at Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.22b, the Inventory step of the wilderness process considers where evidence of past and ongoing human activities are or are not currently substantially noticeable on the landscape. Trade-offs between anticipated future vegetation and other management activities in a given area versus a potential wilderness recommendation for a given area will be considered during Analysis and made available for public comment in the Draft Plan and Draft EIS.

- C. **Colorado Roadless Areas (CRAs):** Comments request that the Evaluation Criteria either categorically include or exclude CRAs from the Analysis step of the wilderness process.

After the Inventory was revised to reflect improved parameters for substantially noticeable features and considerations of adjacent BLM and Rio Grande National Forest lands as described in the Inventory Criteria document, a total of about 13,000 acres of GMUG CRAs remain excluded from the revised Inventory. These pockets of CRA lands are eliminated from the Inventory based on containing substantially noticeable features, such as timber harvest treatments or existing coal infrastructure, and/or being less than 5,000 acres in size and not contiguous to an existing designated area. This is consistent with Forest Service Handbook 1909.12, Chapter 70.

Lands are not included in or excluded from the GMUG's wilderness process based solely on current designation as CRA. The wilderness process is a specific, separate requirement in the 2012 Forest Service Planning Rule and Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12. The Colorado Roadless Rule does not preclude the further consideration of Colorado Roadless Areas for wilderness, when such consideration is done in conjunction with Forest Plan Revision. Furthermore, when revising land management plans, forests are required by the 2012 planning rule (36 CFR 219) to identify and evaluate lands that may be suitable for inclusion in the NWPS, and to determine whether to recommend any such lands for wilderness designation. As directed at Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.1, the inventory process starts by considering existing, relevant information identified during the assessment phase, including information about designated areas such as inventoried roadless areas. Despite the fact that the directives specifically list inventoried roadless areas as a point of consideration, inventoried roadless areas are only one of many current condition/information sets considered during the required wilderness process. Such areas still need to be considered with respect to all other inventory and evaluation criteria. The GMUG Wilderness Process's Inventory Criteria and Evaluation Criteria documents provide the GMUG's interpretation of the inventory and evaluation steps and criteria explained in sections 71 and 72 of the directives, along with revisions based on public input.

In regards to what CRA lands are carried forward into the Analysis step, Forest Service Handbook 1909.12 Directives, Chapter 70, section 73 directs the Responsible Official to identify which specific areas, or portions thereof, from the evaluation to carry forward as recommended wilderness in one or more alternatives in the forest plan EIS. Any lands carried forward into the Analysis step will be based on the results of the entirety of the Evaluation step, including public input, not solely on the basis of lands currently designated as CRA.

- D. **San Juan Mountains Wilderness Bill:** Comments request that the GMUG Wilderness Process incorporate all lands encompassed in the proposed San Juan Mountains Wilderness Bill.

Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.2 directs the Responsible Official to review information provided through public participation during the assessment phase of the plan revision process, including areas that have been proposed for consideration as recommended wilderness through pending legislation. All lands proposed for wilderness designation in the San Juan Mountains Wilderness Bill are included in the revised Inventory and will be considered throughout the GMUG wilderness process. The Forest Plan revision team is aware of minor boundary discrepancies between the GMUG wilderness polygons and the official San Juan Mountains Wilderness Bill polygons. Finer boundary adjustments are expected to occur for any polygons ultimately analyzed, and potentially recommended, for inclusion in the NWPS; therefore, for all intents and purposes, the entirety of the lands included in the San Juan Mountains Wilderness Bill are included in the revised Inventory.

- E. **Collaborative efforts (GPLI and Citizens' Proposal):** Comments request that the GMUG Wilderness Process include consideration of areas put forth in the Gunnison Plan lands Initiative (GPLI) and Citizens' Proposal. Comments also request that the Evaluation criteria include consideration of lands that have wilderness qualities of significance to the local and/or regional community.

Forest Service Handbook 1909.12 Directives, Chapter 70, section 71.2 directs the Responsible Official to review information provided through public participation during the assessment phase of the plan revision process, including areas that have been proposed for consideration as recommended wilderness through a collaborative effort. Two proposals for wilderness and other special designations developed through a collaborative effort were submitted to the GMUG

during the assessment phase of the Forest Plan revision process. These proposals for recommended wilderness will be considered in combination with other public comments received throughout the GMUG wilderness process. These proposals for other special designations, such as recommended Special Interest Areas or Special Management Areas, will be considered in combination with other public comments received throughout the Forest Plan revision process.

Forest Service Handbook 1909.12 Directives, Chapter 70, section 73 (Analysis) directs the Responsible Official to identify a specific list of seven aspects for each polygon included in one or more forest plan alternative. Item 7 in this list is: “A brief summary of the ecological and social characteristics that would provide the basis for the area’s suitability for inclusion in the NWPS.” Therefore, social characteristics and values of applicable lands will be taken into consideration and analyzed for any polygon considered during the Analysis step (included in one or more forest plan alternative).

- F. **Geospatial data:** Comments suggest that errors in the geospatial data used to develop the Inventory map may have mistakenly excluded or included lands from/in the Inventory, and therefore the Evaluation.

To ensure consistency among all Forest Plan revision processes and products, a “snapshot” of GMUG data was taken at the beginning of Forest Plan revision. Given that Forest Plan revision analysis is a landscape-level, programmatic scale, the same data will be used throughout the entire Forest Plan revision process. Updates to specific data sets and/or on-site surveys will be conducted prior to implementation of any projects or, for the wilderness process, any polygon recommendations for wilderness designation.

The geospatial data used in this process is considered the best available corporate data at the time the “snapshot” was taken, and the likelihood of projection issues eliminating an entire polygon (at least 5,000 acre area) is low. To account for evident data discrepancies, polygons less than 50 acres and adjacent to existing designated areas (or where otherwise appropriate) were eliminated from the inventory. For example, such “boundary slivers” occurred between the Fossil Ridge Recreation Management Area and Fossil Ridge Wilderness – designated areas that share a common boundary. These false polygons were an artifact of inaccurate boundary mapping and not relevant for consideration in this process.

It is also important to note that geospatial data serves as a starting point for taking stock of forest lands that may qualify for inclusion in the NWPS. Any lands that may be incorrectly excluded from the Inventory can be discussed, and reintroduced as appropriate, during the Evaluation step. Conversely, the Forest Plan Revision team is aware that some small areas of land may be mistakenly included in the Inventory as a result of outdated data producing minor inaccuracies. Any lands that may be incorrectly included in the Inventory can also be discussed, and identified/dismissed as substantially noticeable, during the Evaluation step. Lastly, finer boundary adjustments are expected to occur for any polygons ultimately analyzed, and potentially recommended, for inclusion in the NWPS. Language has been added to the “Other Substantially Noticeable Improvements Criteria” section of the Inventory criteria to clarify these details.

- G. **Roads and trails:** Comments highlight the presence of specific roads and trails immediately adjacent to or within inventoried polygons. Comments also request that the Wilderness process evaluate the condition of system trails within each polygon.

Regarding roads, the Inventory excludes or includes roads based on the road-related criteria specified in Forest Service Handbook 1909.12 Directives, Chapter 70, Section 71.22(a) – see

Table 1 within the Inventory Criteria document for details on road improvements criteria. Regarding trails, all existing trails (motorized and non-motorized) are included in the Inventory. During Evaluation, all inventoried polygons are evaluated for wilderness characteristics. The evaluation step identifies and considers the presence of existing trails within each polygon in regards to impacts to opportunities for solitude (Criteria 2) and/or the extent of existing access portals in relation to manageability (Criteria 5). However, assessing the current condition of existing trails is outside of the scope of the Wilderness process.

- H. **Continental Divide National Scenic Trail (CDNST):** Comments request that the evaluation criterion specifically consider the presence of any national scenic or historic trail segments within evaluation polygons. Comments were also provided concerning the Gunnison Ranger District Travel Plan decision (dated June 28, 2010) in regards to requirements of the 2009 CDNST Comprehensive Plan and portions of the CDNST which coincide with the Monarch Crest Trail. Additional comments recommend that the Analysis step address the conservation benefits of overlapping Wilderness, Wild and Scenic River, and National Scenic Trail designations. Comments also urge the Forest Service to acknowledge the proposed Continental Divide Wilderness and Recreation Act in relation to the CDNST and the GMUG Forest Planning, including the GMUG Wilderness process.

A bullet has been added to the Evaluation Considerations column within both Question 4b and Question 4c. Primitive-type recreation opportunities that the CDNST offer (primitive hiking and horseback riding) are also considered in relation to Question 2b. Comments regarding management direction for congressionally-designated trails and other special designations will be noted and considered throughout the Forest Plan Revision process, which includes both the Wilderness and Wild and Scenic River processes. Likewise, proposed legislation will be considered throughout the Forest Plan Revision process as applicable and appropriate. The Continental Divide Wilderness Recreation Act does not currently include GMUG National Forest lands.

- I. **Consistency with NEPA:** Comments express concern that the Analysis step described in the Evaluation criteria (“The forest supervisor will determine which polygons to further analyze in the NEPA process”) may be inconsistent with the NEPA requirements to consider a reasonable range of alternatives.

Forest Plan alternatives will be developed that will either include, or not include, “preliminary administrative recommendations” for wilderness areas. Although not all Evaluation polygons will be carried through to the Analysis step, Forest Service Handbook 1909.12, Chapter 70, section 73 requires that the Responsible Official document each evaluated polygon, or portions thereof, that are and are not included in an alternative in the Forest Plan NEPA analysis. Specifically, for each area included in one or more alternative, the Responsible Official must identify and document a specific list of seven detailed items to provide justification for its inclusion. Conversely, the Responsible Official must document the reason for excluding any polygon, or portions thereof, from further analysis. In light of this requirement, no wilderness evaluation polygon will be dismissed arbitrarily.

- J. **Evaluation criteria and polygon rating:** Comments suggest that the GMUG Wilderness process adopt a Likert-type or ordinal scale survey to assist in assigning consistent and comparable wilderness characteristic ratings across all evaluated polygons. Comments also suggest that the Evaluation Criteria document include a table that describes conditions that would merit ratings of outstanding, high, moderate, or low for each criterion.

The evaluation criteria used in the GMUG Wilderness process originates from Forest Service Handbook 1909.12, Chapter 70, section 72.1 (Evaluation of Wilderness Characteristics), is interpreted by the GMUG Forest Plan Revision team, and is revised based on public input. Interpretation and application of the evaluation criteria is a product of this collaborative effort and uses existing data to inform professional judgment.

In order to evaluate each inventoried polygon as consistently as possible, the Forest Plan Revision team developed a Wilderness Characteristics Evaluation Guide (Table 1). Although the assessment of each evaluation criterion involves a level of subjectivity, the Wilderness Characteristics Evaluation Guide provides side-bars to channel evaluation discussions as objectively, clearly, and consistently as possible. To that end, the “Evaluation Considerations” column presents specific fact-finding prompts to document what is, or is not, present within each polygon.

The product of the GMUG Wilderness Evaluation step is a qualitative, overall rating for each polygon – High, Moderate, Low, or No – that reflects the collective evaluation of all wilderness characteristic criterion. A narrative that provides rationale for the overall rating corresponds with each polygon. The “General Characterizations of Wilderness Characteristics Ratings” section of the Evaluation Criteria provides representative descriptions of how each individual criterion are distinguished within the overall rating.

- K. Outstanding opportunities for solitude (Criteria 2a):** Comments express concern about the level of consideration given to sights and sounds originating from outside the polygon when determining the degree to which each polygon offers outstanding opportunities for solitude within the polygon itself.

Forest Service Handbook 1909.12 Directives, Chapter 70, section 72.1, 2(a) specifically directs the Evaluation step to “consider impacts that are pervasive and influence a visitor’s opportunity for solitude within the evaluated area. Factors to consider may include topography, presence of screening, distance from impacts, degree of permanent intrusions, and pervasive sights and sounds from outside the area.” Therefore, sights and sounds originating from outside the polygon (such as nearby travel routes, private properties, population centers, and timber harvest or mineral extraction activities) are weighted based on whether those sights and sounds are pervasively observed from within the polygon to the extent that these sights or sounds would impact opportunities for Forest visitors to experience solitude.

- L. Manageability (Criteria 5):** Comments suggest that consideration of existing rights, uses, and/or activities occurring within the polygon is inappropriate during the Evaluation step. Comments also infer that management of adjacent lands is an inappropriate consideration during the Evaluation step. Comments request that Criteria 5 consider function, access, and management needs in regards to existing improvements located within the polygon.

Forest Service Handbook 1909.12 Directives, Chapter 70, section 72.1(5) directs the Interdisciplinary Team to evaluate the degree to which each polygon may be managed to preserve its wilderness characteristics, and lists the following specific factors to consider: (a) shape and configuration of the area; (b) legally-established rights and uses; (c) specific Federal or State laws that may be relevant to availability of the area for wilderness or the ability to manage the area to protect wilderness characteristics; (d) the presence and amount of non-Federal land in the area; and (e) management of adjacent lands.

Existing rights and uses within each polygon are documented during the evaluation step in regards to the degree to which the each area could be managed to preserve its wilderness

characteristics. The type and extent of other human activities (i.e., recreation use) occurring within each polygon is documented during the evaluation step in regards to Criteria 2a, the degree to which the area provides opportunities for solitude. Identification of improvements within the area (Criteria 1c) in combination with documentation of Criteria 5 factors (b) and (d) account for consideration of function, access, and management needs in regards to existing improvements within each polygon.

Comments highlight that Criteria 5 does not account for impacts from unauthorized uses occurring within the polygon, and suggest that areas with significant occurrences of unauthorized use should not be carried forward for analysis. Additionally, some comments express concern regarding the perceived current lack of funding to adequately manage existing wilderness areas, and the management complications/implications for any new wilderness designations if funding inadequacy continues.

The Evaluation step documents the presence or absence of traits a polygon does or does not possess, specific to the “Evaluation of Wilderness Characteristics” criteria listed in Forest Service Handbook 1909.12 Directives, Chapter 70, section 72.1. Identification of unauthorized uses is not a component of the Evaluation Criteria. However, the Analysis step contemplates a broader range of factors, as outlined in Forest Service Handbook 1909.12 Directives, Chapter 70, section 73. The Analysis step applies comparative critical thinking in regards to potentially recommending an area to be designated as wilderness. Additionally, concepts that contribute to other aspects of manageability, such as visitor management (anticipated visitor volume and capacity) and anticipated volunteer capacity, could also be contemplated during Analysis. Current and anticipated limitations to management capabilities, such as funding and staffing, could also be contemplated during Analysis, but is not considered during this Evaluation stage.

- M. Ecological diversity and ecosystem representation:** Comments request that an Evaluation criterion be added regarding ecological diversity, or that the Evaluation step include consideration of ecosystem representation.

The specific evaluation criteria used in the GMUG Wilderness process originates from Forest Service Handbook 1909.12, Chapter 70, section 72.1 (Evaluation of Wilderness Characteristics), is interpreted by the GMUG Forest Plan Revision team, and is revised based on public input. The evaluation criteria represent specific attributes to fact-find what is, or is not, present within each polygon. The Analysis step begins with the Forest Supervisor determining which evaluated areas, if any, to further analyze in the Environmental Analysis process as part of the Forest Plan proposed action alternatives. The Analysis step will look more closely at considerations such as the ecological diversity of an area and/or the ecosystem representation that an area could offer should that area (or portion of the area) be recommended for inclusion in the NWPS.

- N. Wilderness Recommendation:** Comments assert that it is beyond the authority of the Forest Service to manage an area as wilderness unless and until Congress designates such areas pursuant to the Wilderness Act of 1964.

Forest Service Handbook 1909.12 Directives, Chapter 70, section 74 (Recommendation) states that the final decision document for the forest plan must document a decision on whether to recommend specific areas for inclusion in the NWPS based on the analysis disclosed in the NEPA document and input received during public participation opportunities. Section 74 also indicates that the final decision document for the plan must identify any wilderness recommendation proposals as a “preliminary administrative recommendation” and qualify it by stating:

“This recommendation is a preliminary administrative recommendation that will receive further review and possible modification by the Chief of the Forest Service, the Secretary of Agriculture, and the President of the United States. The Congress has reserved the authority to make final decisions on wilderness designation. Plan implementation is not dependent upon subsequent action related to recommendations for wilderness designation.”

Section 74 states that the forest plan must include plan components that provide for managing areas recommended for wilderness designation to protect and maintain the ecological and social characteristics that provide the basis for each area’s suitability for wilderness recommendation. Contemplating deviation from these requirements is beyond the scope of this process. However, section 74.1 indicates that the Responsible Official has discretion to implement a range of management options when developing plan components for recommended wilderness areas.

- O. Opposition to additional designated wilderness areas:** Comments express resistance to designating more GMUG lands as wilderness, suggesting that all applicable lands have already been designated and removed from multiple use. Comments also express concern that designating more GMUG lands as wilderness could reduce the ability to actively manage forest lands.

When revising land management plans, forests are required to identify and evaluate lands that may be suitable for inclusion in the NWPS, and to determine whether to recommend any such lands for wilderness designation. A description of the process requirements can be found in the 2012 Forest Service Planning Rule and Chapter 70 of the Forest Service Land Management Planning Handbook 1909.12. The requisite wilderness process is a means to appraise forest lands for their wilderness characteristics and scrutinize potential recommendations; however, recommendations are not a required result. Regardless of the direct result of this required process, information gathered from the public, specialists, and other entities throughout the wilderness process can benefit other aspects of plan revision. The wilderness process inherently reveals information about the landscape that can inform the development of management areas or other plan direction.